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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME FOR DEFENDANT TO ANSWER
PLAINTIFFS' THIRD AMENDED
COMPLAINT**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”) and Defendant Google LLC (“Google”), hereby stipulate to the extension of the deadline for Google to answer Plaintiffs’ Third Amended Complaint by fourteen (14) days, from February 8, 2022 up to and including February 22, 2022.

Google and Plaintiffs (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree to the following:

WHEREAS, on September 1, 2021 Plaintiffs filed their Third Amended Complaint for (1) Breach of Contract or, in the Alternative, Quasi-Contract (Unjust Enrichment); (2) Invasion of Privacy Act Violations, Cal. Penal Code § 631; (3) Violations of the Comprehensive Computer Data Access and Fraud Act (“CDAFA”), Cal. Penal Code §§ 502 *et seq.*; (4) Invasion of Privacy; (5) Intrusion Upon Seclusion (ECF No. 131);

WHEREAS, pursuant to Fed. R. Civ. P. 15(a)(3), Google’s deadline to respond to Plaintiffs’ Third Amended Complaint was September 15, 2021;

WHEREAS, on September 13, 2021, the Parties filed a stipulation to extend Google’s deadline to respond to Plaintiffs’ Third Amended Complaint seven (7) days, from September 15, 2021 to September 22, 2021 (ECF No. 134);

WHEREAS, on September 13, 2021, the Court Ordered Google’s deadline for filing an Answer or to otherwise respond to Plaintiffs’ Third Amended Complaint was September 22, 2021 (ECF No. 135);

WHEREAS, on September 22, 2021, Google filed its Notice of Motion and Motion to Dismiss Third Amended Complaint (ECF No. 139), Plaintiffs filed their Opposition on October 6, 2021 (ECF No. 144), and Google filed its Reply on October 13, 2021 (ECF No. 145);

WHEREAS, on January 25, 2022, the Court issued an Order Granting Google’s Motion to Dismiss Counts 1 (Breach of Contract) and 2 (Cal. Penal Code § 631) of Plaintiffs’ Third Amended Complaint and did not grant Plaintiffs leave to amend (ECF No. 209);

WHEREAS, pursuant to Fed. R. Civ. P. 12(a)(4), Google’s deadline to answer the remaining counts in Plaintiffs’ Third Amended Complaint is February 8, 2022;

WHEREAS, the parties have agreed to extend time for Google to file its Answer;

WHEREAS, Google's deadlines to respond to the Complaint, First Amended Complaint, Second Amended Complaint, and Third Amended Complaint have been extended (ECF Nos. 33, 35, 58, 129, 135), and

WHEREAS this requested extension will not affect the case schedule;

WHEREAS, the requested extension of this deadline is made without prejudice to Google seeking a further extension of time should the circumstances warrant;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that Google's deadline to respond to Plaintiffs' Third Amended Complaint is February 22, 2021.

A Proposed Order is submitted concurrently herewith.

IT IS SO STIPULATED.

DATED: February 2, 2022

WILLKIE FARR & GALLAGHER, LLP

By: /s/ Benedict Y. Hur

Benedict Y. Hur

Attorneys for Defendant Google LLC

DATED: February 2, 2022

By: /s/ Amanda Bonn

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Attorneys for Plaintiff

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: February 2, 2022

WILLKIE, FARR & GALLAGHER LLP

/s/ Benedict Y. Hur

Benedict Y. Hur

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Judge: Hon. Richard Seeborg
Courtroom: 3, 17th Floor

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the deadline for Google to respond to Plaintiffs' Third Amended Complaint is February 22, 2022.

IT IS SO ORDERED.

Dated: _____

Honorable Richard Seeborg